

WILMERHALE

February 5, 2020

VIA ECF

The Honorable Colleen McMahon
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

2/7/2020

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OK

Re: *United States v. Michael Carroll, et al.*, No. 19-cr-545 (CM)

Dear Chief Judge McMahon:

Colleen McMahon

This firm represents Michael Carroll in the above-referenced matter. Pursuant to Rule V.E of the Court's Individual Practices and Procedures, we write to respectfully request leave to file an omnibus reply, in excess of 10 pages, in support of Mr. Carroll's Motion to Dismiss the Indictment, ECF No. 55; Motion for a Bill of Particulars, ECF No. 52; Motion to Compel Discovery, ECF No. 43; and Motion to Compel Production of *Brady* Materials, ECF No. 58. Mr. Carroll intends to submit one reply addressing these four motions, and thus requests up to 25 pages for this filing.

Respectfully submitted,

/s/ Peter G. Neiman

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